

# **EXHIBIT C**

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1 UNITED STATES DISTRICT COURT  
2 SOUTHERN DISTRICT OF NEW YORK  
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3 MAHMOUD KHALIL, *et al.*,

4 Plaintiffs,

5 v.

25 Civ. 2079 (AS)

6 THE TRUSTEES OF COLUMBIA  
7 UNIVERSITY IN THE CITY OF NEW  
YORK, *et al.*,

8 Defendants.

Oral Argument

9 -----x

10 New York, N.Y.  
March 25, 2025  
2:00 p.m.

11 Before:

12 HON. ARUN SUBRAMANIAN,

13 District Judge  
14

15 APPEARANCES

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1 suggestions that funding would be either withdrawn or paused if  
2 those measures were not taken by March 20?

3 MR. MILLER: Your Honor, many of those measures were  
4 the product of months and months of work. I think it is also  
5 important for the record that everyone understands that these  
6 things don't match up one to one.

7 THE COURT: That's why I said it the way I did.

8 Is it the university's position that it would have  
9 taken the steps outlined in the March 21 announcement whether  
10 or not there had been any indication that federal funding would  
11 have been withdrawn?

12 Yes or no.

13 MR. MILLER: Well, your Honor, I mean, it is a  
14 hypothetical that I think I would want to make sure --

15 THE COURT: I don't think it is a hypothetical. It's  
16 just asking what the university's position is on what actually  
17 happened.

18 There was the March 21 announcement of those steps.

19 Would that have been done whether or not there had  
20 been any indication from the Executive Branch defendants that  
21 funding would be withdrawn?

22 MR. MILLER: May I have a moment, your Honor.

23 THE COURT: You may.

24 (Pause)

25 MR. MILLER: I think, your Honor, the best way to put

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1 it was that all the 18 actions that were announced on March 21  
2 were actions that were under review and work and development  
3 for many months.

4 I think the letter from the government essentially  
5 crystallized those lines of effort and affected timing. But  
6 all of those lines of effort were in play and were ongoing for  
7 some significant periods of time before the March 13 letter and  
8 ultimate March 21 announcement.

9 THE COURT: Right.

10 So it is at least Columbia's position here that the  
11 steps outlined in the March 21 announcement would have been  
12 taken regardless of any suggestion relating to funding?

13 MR. MILLER: I think it's -- I think that -- I just  
14 want to be careful about the timing particularly, your Honor.

15 The university recognized that actions needed to be  
16 taken. The university engaged in a significant amount of work.  
17 I would be happy to -- I think it would be useful to talk about  
18 the definition, for example --

19 THE COURT: I don't want to get -- I will let you  
20 speak to that. Let me just make sure I understand.

21 You are saying that we were talking about a lot of  
22 these things. It may be that the timing and the precise  
23 substance of these things were related to the March 13 letter  
24 and the suggestion about funding. That might have sped up how  
25 we were doing things. It may have affected the particular

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1 inquiries that we had. But, generally speaking, the university  
2 was looking into some of these issues.

3 Is that a fair characterization?

4 MR. MILLER: Yes. And looking into it with a degree  
5 of urgency as well.

6 I don't want to make it seem like the university was  
7 dithering. It wasn't. It was looking at them with diligence  
8 and with care.

9 But in terms of the precise timing of the announcement  
10 of them and the crystallization of them into these actions, I  
11 do want to be, you know, clear that the March 13 letter did  
12 have an impact.

13 THE COURT: All right. Okay.

14 So, Mr. Abbas, I will throw it back to you. Then we  
15 will cycle around and give each -- let's try to do it five  
16 minutes or so.

17 And I'll let you cover anything you need to, just so  
18 we can try to wrap up by 4 p.m.

19 And I will have some next steps for everybody.

20 MR. ABBAS: Yes, your Honor.

21 Ms. Greer is going take from it here.

22 MS. GREER: I had prepared some remarks here, but I  
23 won't read all of it because I think it will take us a little  
24 too long.

25 But I would like to take a moment to think about the